

CHAPTER 11

MATCHING PROGRAM PROCEDURESA. OMB MATCHING GUIDELINES

The OMB has issued special guidelines to be followed in programs that match the personal records in the computerized data bases of two or more federal agencies by computer (see Appendix I). These guidelines are intended to strike a balance between the interest of the government in maintaining the integrity of federal programs and the need to protect individual privacy expectations. They do not authorize matching programs as such and each matching program must be justified individually in accordance with the OMB guidelines.

B. REQUESTING MATCHING PROGRAMS

1. Forward all requests for matching programs to include necessary routine use amendments (see subsection C.9 of Chapter 6) and analysis and proposed matching program reports (see subsection E.6. of Appendix I) to the Defense Privacy Office.

2. The Defense Privacy Office shall review each request and supporting material and forward the report and system notice amendments to the Federal Register, OMB, and Congress, as appropriate.

3. Changes to existing matching programs shall be processed in the same manner as a new matching program report.

C. TIME LIMITS FOR SUBMITTING MATCHING REPORTS

1. No time limits are set by the OMB guidelines. However, in order to establish a new routine use for a matching program, the amended system notice must have been published in the Federal Register at least 30 days before implementation (see subsection A.6. of Chapter 6).

2. Submit the documentation required by subsection B.1., of this Chapter to the Defense Privacy Office at least 45 days before the proposed initiation date of the matching program.

3. The Defense Privacy Office may grant waivers to the 45 days' deadline for good cause shown. Requests for waivers shall be in writing and fully justified.

D. MATCHING PROGRAMS AMONG DoD COMPONENTS

1. For the purpose of the OMB guidelines, the Department of Defense and all DoD Components are considered a single agency.

2. Before initiating a matching program using only the records of two or more DoD Components, notify the Defense Privacy Office that the match is to occur. The Defense Privacy Office may request further information from the Component proposing the match.

3. There is no need to notify the Defense Privacy Office of computer matches using only the records of a single Component.

E. ANNUAL REVIEW OF SYSTEMS OF RECORDS

The system manager shall review annually each system of records to determine if records from the system are being used in matching programs and whether the OMB Guidelines have been complied with.